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Cynthia Lie
Assistant U.S. Attorney
United States Courthouse.
Suite 9200
1 Courthouse Way
Boston, MA 02210

March 30, 2004

Dear Ms. Lie:

The defendant respectfully requests additional discovery materials in the matter of United States v. Christopher Sugar, Criminal No. 03-cr-10362-PBS. Specifically, the defendant requests:

1. Any and all training records of the police dog used in this case and the dog handler, including initial training and all maintenance training.
2. Any and all incident reports that utilized the police dog and handler
3. Any and all veterinary records of the police dog.
4. Any and all photographs or videos involving the dog handler team on or about October 22, 2003.
5. Any and all ancillary use reports, including photos and videos of the use of the dog-handler team in this case.

Sincerely,

Mark W. Shea